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Lake Forest Bankruptcy
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4 **PROPOSED ATTORNEY FOR**
DEBTOR-IN-POSSESSION
JEFFREY SCOTT BEIER

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8 **UNITED STATES BANKRUPTCY COURTS**
9 **CENTRAL DISTRICT OF CALIFORNIA-SANTA ANA DIVISION**

10 In Re: JEFFREY SCOTT BEIER

) BK. No. 8:23-bk-10898-TA

) **Chapter 11**

) **STIPULATION REGARDING THE**
) **REQUEST TO CONTINUE THE**
) **HEARING ON DEBTOR-IN-**
) **POSSESSION JEFFREY SCOTT BEIER'S**
) **MOTION TO CONTINUE THE**
) **AUTOMATIC STAY**

) **JUDGE**

) Hon. Theodor Albert

) **HEARING**

) Date: May 23rd, 2023

) Time: 10:30 A.M.

) Place: 411 West Fourth Street #5B, Santa
) Ana, CA 92701 (By Zoom.gov)

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DEBTOR-IN-POSSESSION JEFFREY SCOTT BEIER ("Debtor") and CREDITOR
BANK OF AMERICA ("BANA") hereby stipulate and request as follows:

I. RECITALS

- A. On April 28th, 2023, the Debtor filed a Chapter 11 Petition.
- B. This filing was the second filing within 1 year of a prior filing.
- C. On May 2nd, 2023 the Debtor filed a Motion to Continue the Automatic Stay ("Motion"). This motion was set for a hearing on May 23rd, 2023.
- D. On May 11th, 2023 BANA filed an opposition to this Motion. BANA is the putative primary lender holding a secured claim against the only real property in the bankruptcy estate located at 10 Tucson, Trabuco Canyon, CA 92679.
- E. Counsel for Debtor and BANA have met and conferred and have agreed to conduct their own appraisals of the real property at issue.
- F. In consideration of these appraisals, the parties have jointly reached an agreement regarding the hearing on the Motion.

II. STIPULATION

Debtor and BOA request that the court continue the hearing to June 27th, 2023 at 10:30 A.M.


By the signature of counsel below, BANA consents to the extension of the stay for an interim period until the continued hearing date.

Dated: 5/22/23

Signed: 

ANERIO V. ALTMAN
PROPOSED COUNSEL FOR
DEBTOR-IN-POSSESSION
JEFFREY SCOTT BEIER

1 Dated: 5/17/2023

Signed: 
GREG P. CAMPBELL
ALDRIDGE PITE, LLP
COUNSEL FOR
BANK OF AMERICA, N.A.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

PO Box 515381, Los Angeles, CA 90051

A true and correct copy of the foregoing document entitled (*specify*):

Stipulation regarding hearing on Motion to Continue Stay

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 05/22/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Anerio V Altman LakeForestBankruptcy@jubileebk.net, lakeforestpacer@gmail.com
Greg P Campbell ch11ecf@aldridgepate.com, gc@ecf.inforuptcy.com;gcampbell@aldridgepate.com
Michael J Hauser michael.hauser@usdoj.gov
United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) 05/22/2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

No US Mail Service

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method

for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 05/22/2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Delivery to the court per the court manual.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

<u>05/22/2023</u>	<u>Anerio Ventura Altman, Esq.</u>	<u>/s/ Anerio Ventura Altman, Esq.</u>
Date	Printed Name	Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.